

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ROBERT FIREMAN and ANN RAIDER,

Plaintiffs,

v.

Civil Action No. 05-11740-MLW

NEWS AMERICA MARKETING IN-STORE,
INC.,

Defendant.


AFFIDAVIT OF BILL ADAM

I, Bill Adam, on oath, depose and state as follows:

1. My name is Bill Adam. I am a resident of Connecticut. I make this affidavit on personal knowledge.
2. Prior to its acquisition by News America Marketing ("NAM"), I was employed by Consumer Card Marketing, Inc. ("CCMI") in the Boston area.
3. Shortly after CCMI was acquired by NAM, I informed Henri Lellouche that I was unhappy with the working environment and intended to resign my position.
4. Mr. Lellouche asked that, if instead of quitting, I would consider moving to NAM's office in Norwalk, Connecticut. After consulting with my wife, I accepted NAM's offer. While working in Connecticut, I continued to perform computer-related work for SmartSource Direct (formerly CCMI).

5. Had I not been offered the opportunity to relocate to Connecticut, I would have terminated my employment with CCMI.

Signed under the pains and penalties of perjury this 10th day of December, 2007.



Bill Adam

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 14th day of December, 2007.

/s/ Gordon P. Katz
Gordon P. Katz